

U.S. Department of Justice



United States Attorney

Southern District of New York

USDS SDNY

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The Silvia J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

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DATE FILED: 7/22/11

July 22, 2011

BY FACSIMILE

The Honorable Kimba M. Wood
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Daniel Stewart, et al.,
10 Cr. 283 (KMW)

Dear Judge Wood:

The Government respectfully writes to request that the next status conference in this matter, presently scheduled for July 25, 2011, be adjourned until 4:30 p.m. on September 14, 2011. The reason for the requested adjournment is that counsel for defendant Reynold Hector is unavailable on July 25, 2011, as well as to permit the parties to conclude negotiations regarding a disposition of this matter.

[] *Granted*
KMW

If the Court is inclined to grant the adjournment, the Government respectfully requests that time be excluded under the Speedy Trial Act from July 25, 2011, until September 14, 2011, in the interests of justice so that the parties may continue to discuss a potential disposition of this matter. A copy of a proposed Order excluding time has been enclosed for the Court's convenience.

The Government has conferred with David Lewis, Esq., counsel for defendant Reinold Hector, who consent to this request in its entirety on behalf of his client. The Government, thus far, has been unable to confer with Bennett Epstein, Esq., counsel for defendant Jason Farrell. The Government believes that it has reached an agreement in principle with Mr. Epstein, and therefore does not believe that Mr. Epstein would object to the requested continuance.

Respectfully submitted,

PREET BHARARA

United States Attorney

By:

Sean S. Buckle **SO ORDERED: N.Y.N.Y.**
Assistant United States Attorney
(212) 637-2261

7/22/11

cc: Bennett Epstein, Esq. (by facsimile)
David Lewis, Esq. (by facsimile)

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.